

EXHIBIT A

State Court Documents

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE) THIRTEENTH JUDICIAL CIRCUIT

Denine Rhinehart,)
Plaintiff,)
Check Into Cash of)
South Carolina, Inc.)
Defendant.)

SUMMONS
2020-CP-23-_____
JURY TRIAL DEMANDED

TO THE DEFENDANT(S) ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint hereto attached and to serve a copy of your answer on the plaintiff's attorney at 409 Main Street, Greenwood, South Carolina within thirty (30) days after the service of this Summons upon you, exclusive of the day of service. If you fail to answer the complaint within that time, the plaintiff shall apply to the Court for a judgment by default against you for the relief demanded in said complaint.

s/Wm. Chad Bettis
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Attorney for Plaintiff

Greenwood, SC
February 11, 2020

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
) THIRTEENTH JUDICIAL CIRCUIT
COUNTY OF GREENVILLE)

Denine Rhinehart,)
)
Plaintiff,)
)
vs.)
)
Check Into Cash of)
South Carolina, Inc.)
)
Defendant.)

COMPLAINT
2020-CP-23-_____
JURY TRIAL DEMANDED

Plaintiff alleges:

**FOR A FIRST CAUSE OF ACTION
(S.C. Code Ann. 41-10-10 *et seq.*)**

1. That the plaintiff is a citizen and resident of the County of Laurens, State of South Carolina.
2. The Plaintiff is informed and believes that defendant is a corporation organized and existing under the laws of the State of South Carolina and has its principal place of business, owns property, and maintains employees in the County of Greenville, State of South Carolina.
3. At all times relevant hereto, Plaintiff was an employee of Defendant and Defendant was the employer of Plaintiff.
4. That this cause of action is brought pursuant to S.C. Code Ann. 41-10-10, *et seq.*
5. That plaintiff was employed by defendant from on or about November 25, 2002 until May 11, 2018.

6. That during the period from May 6, 2016 through May 11, 2018 plaintiff worked for defendant as a district training manager, primarily out of defendant's Taylors, South Carolina location in Greenville County, and worked an average of 5 days per week for an average of well over 40 hours per week.

7. That although plaintiff has earned hourly wages and overtime wages working for defendant during the period May 6, 2016 through May 11, 2018, defendant has failed to pay plaintiff any wages for overtime hours she worked throughout this term of employment with defendant.

8. That defendant did not pay plaintiff any overtime wages for all hours plaintiff worked for defendant in excess of 40 hours per week during the period from May 6, 2016 through May 11, 2018, approximately 290 hours of overtime.

9. That said actions by defendant in failing to pay plaintiff any overtime wages due to plaintiff are in violation of S.C. Code Ann. 41-10-10 *et seq.*, and plaintiff has been substantially damaged as set forth hereinbelow.

10. That as a direct result of defendant failing to pay plaintiff the earned wages due to her, plaintiff has suffered damages in an amount of approximately \$5,180.47, plus interest, for period May 6, 2016 through May 11, 2018.

FOR A SECOND CAUSE OF ACTION
(Fair Labor Standards Act)

11. Plaintiff realleges the allegations contained in paragraphs 1 - 10 of the complaint that are relevant to this Cause of Action as if restated herein verbatim.

12. At all times relevant hereto, Plaintiff regularly worked more than forty hours per week in the employment of the Defendant.

13. Defendant failed to pay Plaintiff at the rate of one-and-a-half times the normal rate of pay for all hours worked in excess of forty hours weekly as required by section 7(a) of the FLSA 29 U.S.C. 207(a).

14. Plaintiff is entitled to back wages at the rate of one-and-half times her regular rate of pay for all overtime hours worked in excess of forty hours per week, pursuant to section 16(b) of the FLSA, 29 U.S.C. 216(b).

15. The failure of Defendant to compensate Plaintiff for overtime work as required by the FLSA was knowing, willful, intentional and done in bad faith.

16. Plaintiff is entitled to liquidated damages equal to the amount of overtime compensation due to her under the FLSA, pursuant to section 16(b) of the FLSA, 29 U.S.C. 216(b).

17. The work and pay records of Plaintiff are in the possession, custody, and/or control of Defendant, and Defendant is under a duty pursuant to section 11(c) of the FLSA, 29 U.S.C. 211(c), and by the regulation of the United States Department of Labor to maintain and preserve payroll and other employment records with respect to the Plaintiff, from which the amount of Defendant's liability can be ascertained.

18. Plaintiff is also entitled to an award of reasonable attorney fees and costs incurred in prosecuting this action, pursuant to 29 U.S.C. 216(b).

WHEREFORE, plaintiff demands judgment against the Defendant as follows:

1. On the First Cause of Action,

a. For an order that Defendant has willfully violated S.C. Code Ann. 41-10-10 *et seq* and has deprived the plaintiff her rights to such

- compensation;
- b. An order requiring Defendant to provide a complete and accurate accounting of all compensation to which Plaintiff is entitled;
 - c. An award of monetary damages to Plaintiff in the form of unpaid wages as stated hereinabove, plus interest, and that these damages be trebled;
 - d. Attorneys fees and costs and disbursements in this action;
2. On the Second Cause of Action, for:
 - a. A declaratory judgment that Defendants has willfully and in bad faith violated the overtime compensation provisions of the FLSA, and has deprived Plaintiff of her rights to such compensation;
 - b. An order requiring Defendant to provide a complete and accurate accounting of all the overtime compensation to which Plaintiff is entitled;
 - c. An award of monetary damages to Plaintiff in the form of overtime back pay compensation, together with liquidated damages in an equal amount;
 - d. Pre-judgment interest;
 - e. Attorneys fees and costs; and
 3. For such other and further relief as the court deems just and proper.

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